

1 JUDGE STEINBERG: Overruled.

2 THE WITNESS: Would you ask the question again
3 then?

4 BY MR. KNOWLES-KELLETT:

5 Q When you talked to David, did he tell you anything
6 other than I will get the license out of your name within
7 six months?

8 A Right.

9 MR. ROMNEY: Same objection, Your Honor.

10 JUDGE STEINBERG: Same ruling.

11 MR. KNOWLES-KELLETT: It goes to admission of a
12 party.

13 JUDGE STEINBERG: Same ruling. You have the
14 ruling.

15 THE WITNESS: Right. David said we're going to
16 get this straightened out and that he'd get it out of my
17 name.

18 BY MR. KNOWLES-KELLETT:

19 Q Did he tell you anything else?

20 A No. That's it.

21 Q Okay. Were you compensated in any way for having
22 the license --

23 THE REPORTER: Excuse me.

24 (Pause.)

25 MR. KNOWLES-KELLETT: Your Honor, I just want to

1 be clear on what was struck from the record. Was all
2 discussion about these applications struck or just the part
3 that was unclear about what the time frame was?

4 JUDGE STEINBERG: I think everything having to do
5 with the conversation between Ms. Lutz and the witness. I
6 mean, I think there was --

7 MR. KNOWLES-KELLETT: Okay.

8 JUDGE STEINBERG: -- massive confusion at least in
9 my own mind, if not the witness' mind, about which
10 applications you were talking about with respect to which
11 questions. If you want to go over all of that again, I'm
12 sorry, but --

13 MR. KNOWLES-KELLETT: Okay.

14 JUDGE STEINBERG: -- it wasn't clear to me. Maybe
15 it was clear to you.

16 Certainly the part about the conversation, the
17 timing of the conversation, what the conversation was about,
18 whether the original application or a renewal application.

19 (Pause.)

20 JUDGE STEINBERG: Why don't you ask your next
21 question? There is too much dead time.

22 MR. KNOWLES-KELLETT: Okay. Sorry.

23 BY MR. KNOWLES-KELLETT:

24 Q I'd like to show you Part 90, Rule Section 9149,
25 okay?

1 A 49?

2 Q 9149.

3 A Yes.

4 Q I'd like you to read the first paragraph, please.
5 You can read it out loud if you'd like.

6 A License status authorized under this part will be
7 issued for a term not to exceed five years from this date.

8 Q Okay. That is the part that is the integral part.

9 JUDGE STEINBERG: Couldn't you just ask that
10 official notice be taken of the rule?

11 MR. KNOWLES-KELLETT: Okay. Could official rule
12 be taken of the rule?

13 JUDGE STEINBERG: Well, it's a rule so I'll take
14 official notice of it.

15 MR. KNOWLES-KELLETT: Of 9149. These licenses are
16 issued for a term not to exceed five years. Okay.

17 BY MR. KNOWLES-KELLETT:

18 Q If you would turn to page 2 of your exhibit, of
19 Exhibit 65? Do you see that this license expired at 11-3-00
20 at the top?

21 A Yes.

22 Q Okay.

23 A That's four years. Five years.

24 Q Five years.

25 JUDGE STEINBERG: I know where you're going here.

1 MR. KNOWLES-KELLETT: Okay.

2 JUDGE STEINBERG: Just because the rule says that
3 the license can't be issued for a term exceeding five years
4 doesn't mean it can't be issued for a term of less than five
5 years, so the license could have been issued on 11-28-97 and
6 expired three years later.

7 MR. KNOWLES-KELLETT: Okay.

8 JUDGE STEINBERG: I mean, whether the Commission
9 does that or not I don't know because we don't have any
10 witnesses that says what it does.

11 MR. KNOWLES-KELLETT: Okay. We don't yet have any
12 of those witnesses, Your Honor, and I would like just a
13 little bit of leeway to talk to him about when he first
14 applied for this license.

15 MR. ROMNEY: Objection, Your Honor. I don't see
16 how talking to this man about the rules of the FCC is going
17 to in any way trigger his memory about when he applied for
18 the license.

19 JUDGE STEINBERG: I'll give you a little leeway.
20 Let's see if we can get a recollection refreshed, but --

21 MR. KNOWLES-KELLETT: Okay.

22 JUDGE STEINBERG: -- let's move it on.

23 MR. KNOWLES-KELLETT: Okay.

24 BY MR. KNOWLES-KELLETT:

25 Q What is your best recollection of when you first

1 applied for this license? If it's unclear in your mind --

2 A It's unclear. I know I done it after I went to
3 work for Metroplex Two Way.

4 Q Okay. Do you think it was soon after?

5 A I'm pretty sure it was soon after because I was
6 picking the van up at his house. Six months after that I
7 started picking it up at the shop, so it had to be right
8 after. I went to work for Metroplex Two Way on February 28,
9 I believe.

10 Q Of what year?

11 A Of 1994 or 1995, one of the two. It was shortly
12 -- I think I was training for two weeks, and then I started
13 picking the van up at Patsy and Ron's house.

14 No. It was longer than that because we was using
15 a different van, and the van that I was using was -- I
16 started having problems with it, and I was out at night so
17 we started using Ron's van because it was a newer van. The
18 other van drank so much gas.

19 Q So approximately when do you --

20 A I would say six months after I went to work.

21 Q Okay. So it would have been the 1994-1995 time
22 frame?

23 A Right.

24 Q Okay. Do you recall any other applications
25 between then and your renewal application in August of 2000?

1 A I received paperwork from you all or the FCC that
2 come to my house, and then I'd take it to Ron's office.

3 Q Okay. Do you recall signing any other paperwork?

4 A No, I don't.

5 Q Okay. Did you open the paperwork?

6 A Yes, I did.

7 Q Okay. Before you took it to Ron?

8 A Right.

9 Q Okay. Do you know if the mobiles in your trucks
10 or vehicles use these frequencies?

11 A No, I don't.

12 Q You don't know?

13 JUDGE STEINBERG: What are these frequencies?

14 MR. KNOWLES-KELLETT: The ones authorized on --

15 JUDGE STEINBERG: Page 2?

16 MR. KNOWLES-KELLETT: On page 2 of the exhibit.

17 THE WITNESS: No, I don't. I do not know.

18 JUDGE STEINBERG: Okay. You don't know or --

19 THE WITNESS: I do not know. They could. I don't
20 know.

21 MR. KNOWLES-KELLETT: Okay.

22 BY MR. KNOWLES-KELLETT:

23 Q Did you have radios in your vehicles before you
24 got the license?

25 A I don't believe so.

1 Q Okay. Were you compensated in any way for getting
2 this license for DLB?

3 MR. ROMNEY: Objection to the term compensated.
4 Unclear.

5 JUDGE STEINBERG: Is it unclear to the witness?

6 THE WITNESS: No. The only thing I was
7 compensated was I had a job.

8 MR. KNOWLES-KELLETT: Okay.

9 BY MR. KNOWLES-KELLETT:

10 Q Were you told that the mobiles in your car were in
11 any way compensation for anything else?

12 MR. ROMNEY: Objection. Leading.

13 JUDGE STEINBERG: I'll overrule it.

14 THE WITNESS: I was told after this all got
15 started that I had radios in my vehicle, so I was authorized
16 in other words. I had the radios in my possession, in other
17 words, so it was my radio system.

18 JUDGE STEINBERG: When you said after all this got
19 started, what did you mean?

20 THE WITNESS: Well, after all this trial started.

21 JUDGE STEINBERG: Now, you go to work every day,
22 correct?

23 THE WITNESS: Yes, sir.

24 JUDGE STEINBERG: And you put in a full day?

25 THE WITNESS: Yes, sir.

1 JUDGE STEINBERG: And you put in a full week?

2 THE WITNESS: Yes, sir.

3 JUDGE STEINBERG: And you get a paycheck?

4 THE WITNESS: Yes, sir.

5 JUDGE STEINBERG: So you're not --

6 THE WITNESS: No, I don't. I work.

7 JUDGE STEINBERG: -- being paid for doing nothing?

8 THE WITNESS: Right. I do work five days a week.

9 BY MR. KNOWLES-KELLETT:

10 Q Okay. What other Metroplex employees have phones
11 in their cars?

12 A I'd say the biggest majority of them have phones
13 in their cars.

14 Q Okay. Can you just list the names of the ones you
15 know that have phones in their cars?

16 A Well, John Lucas. He's got hand helds. Ed's got
17 one in his car. I don't -- Ed. I don't know his last name.
18 Keith Krohn has got one in his vehicle. I know Tom has got
19 one in his, but I don't know Tom's last name either.

20 Q Do you recall your deposition being taken in
21 November?

22 A Yes.

23 Q I would like to show you line 7, page 24, of your
24 deposition and see if that refreshes your recollection.

25 A Line what?

1 Q Line 17, page 24.

2 MR. ROMNEY: Objection, Your Honor. With a
3 non-party, you can't use a deposition to refresh
4 recollection. You can use it to impeach, but not to show
5 him and say do you remember saying that?

6 JUDGE STEINBERG: Under the Commission's rules,
7 you can use a deposition for that purpose.

8 THE WITNESS: This Ken Siminoux, he don't even
9 work there anymore. That's why I didn't give his name.

10 MR. KNOWLES-KELLETT: Okay.

11 JUDGE STEINBERG: You can also ask do you know Ken
12 Siminoux --

13 MR. KNOWLES-KELLETT: Okay.

14 JUDGE STEINBERG: -- and does Ken Siminoux to your
15 knowledge, and the witness would have said he doesn't work
16 there anymore. You could have said when he worked there did
17 he have a phone in your car, and you could have gotten an
18 answer. Now you don't have an answer to that question.

19 BY MR. KNOWLES-KELLETT:

20 Q When Ken Siminoux worked there, did he have a
21 phone in his car?

22 A I believe he had one in his car, and his wife had
23 one in her car, too.

24 Q Okay.

25 JUDGE STEINBERG: You didn't have to show him the

1 deposition.

2 BY MR. KNOWLES-KELLETT:

3 Q Did his wife work at DLB?

4 A No, she didn't.

5 Q Okay. Did any other family members or do any
6 other family members of DLB employees have phones?

7 A I don't know.

8 Q Okay. For what purpose do the phones in these
9 people's cars serve?

10 A Well, it's kind of a company gift, or if they're
11 in their own personal car -- see, I use my own personal car
12 sometimes for work if I'm going out, and if I want to come
13 back I'll use it and have my tools with me. That way if
14 they need to contact me they can, or I can contact them and
15 let them know what's going on.

16 Q Do I understand then that the dual purpose is
17 partly for your personal use and partly for work purposes?

18 A Yes, for the company.

19 Q Okay. With respect to family members who have
20 phones, would you understand that to be just for personal
21 use?

22 MR. ROMNEY: Objection. Calls for speculation.

23 JUDGE STEINBERG: Whose family members? His or
24 the employees'?

25 MR. KNOWLES-KELLETT: Ken Siminoux's wife.

1 JUDGE STEINBERG: Pardon me?

2 MR. KNOWLES-KELLETT: For example, Ken Siminoux's
3 wife.

4 THE WITNESS: I think it was just --

5 MR. ROMNEY: Objection. Calls for speculation.
6 Lacks foundation.

7 JUDGE STEINBERG: Do you know whether Ken
8 Siminoux's wife has a phone in her car?

9 THE WITNESS: Well, she did. I've seen it in her
10 car.

11 JUDGE STEINBERG: You've seen it in her car?

12 THE WITNESS: I've heard them talk on the two-way.
13 Theirs and mine is the same. They can talk, and I can talk.

14 JUDGE STEINBERG: So you can hear on your phone
15 everyone using that frequency?

16 THE WITNESS: Yes.

17 JUDGE STEINBERG: And you know when it's not being
18 used then you can talk?

19 THE WITNESS: Right. Right.

20 JUDGE STEINBERG: What was the question?

21 BY MR. KNOWLES-KELLETT:

22 Q I was wondering if there was a work purpose or
23 what purpose you understood it to be?

24 A Just I think it was just more or less convenience
25 for them.

1 Q Would you personally use a company benefit being
2 an employee?

3 A Yes.

4 (Pause.)

5 MR. KNOWLES-KELLETT: No further questions, Your
6 Honor.

7 JUDGE STEINBERG: They may be revisiting the
8 decision.

9 MR. ROMNEY: All right.

10 MR. KNOWLES-KELLETT: Just a couple further
11 questions, if I could.

12 BY MR. KNOWLES-KELLETT:

13 Q Did anybody at DLB tell you how to testify today?

14 A Well, there's been a few that told me how to
15 testify, but I didn't listen to them.

16 Q Okay. Who told you how to testify?

17 A Ronald told me not to tell that I had signed -- he
18 asked me to sign for the license.

19 Q Okay. Who else talked to you?

20 A That's the only ones really talked to me about it.

21 JUDGE STEINBERG: When did this take place?

22 THE WITNESS: Probably before that first
23 deposition when I went down there.

24 JUDGE STEINBERG: Before the first --

25 THE WITNESS: Yes.

1 JUDGE STEINBERG: -- deposition?

2 THE WITNESS: Right.

3 BY MR. KNOWLES-KELLETT:

4 Q Have you had any discussions since that deposition
5 regarding how to testify today?

6 A No.

7 MR. KNOWLES-KELLETT: No further questions, Your
8 Honor.

9 MR. ROMNEY: Does anybody have a copy of the
10 deposition I can use with this witness, please? Thank you.

11 CROSS-EXAMINATION

12 BY MR. ROMNEY:

13 Q Mr. Lewis, my name is Mark Romney. I represent
14 Ronald Brasher. I believe I met you at your deposition. Is
15 that correct?

16 A Right.

17 Q Let me refer you to your deposition, page 27,
18 beginning at line 6. Do you see that, sir? Do you see
19 that? I just need to know if you are on that page?

20 A Yes. I see the question.

21 Q Do you recall having your deposition taken on
22 December 1, 2000, in Dallas?

23 A Yes.

24 Q Sir, on page 27, line 6, beginning on line 6, do
25 you recall these questions and these answers being given in

1 that deposition?

2 A Yes.

3 Q Question on line 6:

4 "Q Did anybody discuss with you -- have you
5 discussed this case with Mr. Brasher?"

6 I will refer to the Court that that was referring
7 to Mr. Ronald Brasher.

8 A Right.

9 Q "A Have I?"

10 "Q Yes."

11 "A No, I haven't."

12 "Q Did anybody discuss with you what your
13 testimony would be here today?"

14 "A Did anybody discuss?"

15 "Q Yes."

16 "A No."

17 Were those questions asked of you, sir, and did
18 you give those answers at that deposition?

19 A It appears -- it looks like it's turned around.

20 Q Did you give those answers in that deposition,
21 sir?

22 A It says, "Q Yes." It should be, "A Yes."

23 Q My question is a yes or no question, sir.

24 A Yes. Yes.

25 Q You gave those answers to those questions at

1 deposition. Yes, sir?

2 A Yes.

3 Q Now, sir, if you would turn to Exhibit No. 65? It
4 is the one you had before, sir.

5 A Sixty-five.

6 Q You own how many wrecking trucks, sir?

7 A I don't own no wrecking truck.

8 Q Have you ever owned one?

9 A No, I haven't.

10 Q Do you lease any?

11 A No, I haven't.

12 Q Do you use some?

13 A No, I haven't.

14 Q Have you ever done a wrecking business at all?

15 A No, I haven't.

16 Q Have you ever hauled cars for anybody?

17 A I've hauled cars for myself.

18 Q What do you haul them with?

19 A A trailer.

20 Q Okay. How many trailers do you have?

21 A One.

22 Q How many vehicles do you have, sir?

23 A Three.

24 Q How many mobile radios do you have in those
25 vehicles?

1 A I got two.

2 Q Do you have any hand helds?

3 A I've got one.

4 Q So you have a total of three radios? Is that
5 correct?

6 A Right.

7 Q You used to work for who before you went to work
8 for DLB?

9 A Central Freight Lines.

10 Q And you started working with DLB in approximately
11 1994? Is that not correct, sir?

12 A Right.

13 Q And you applied for an FCC license for the very
14 first time for a mobile radio license in 1994, did you not,
15 sir?

16 A It was 1994 or 1995. Somewhere in there.

17 Q Have you seen that document, your application for
18 the 1994 license or the 1995 license, in any of this
19 litigation that you have been in?

20 A I believe it's this one I'm looking at.

21 JUDGE STEINBERG: Okay. You say this one you're
22 looking at. You're looking at --

23 MR. ROMNEY: Exhibit No. 65.

24 JUDGE STEINBERG: -- Exhibit No. 65, page 1, is
25 what the witness has in his hands.

1 THE WITNESS: As far as I know, this is it.

2 MR. ROMNEY: Okay.

3 BY MR. ROMNEY:

4 Q If it is shown that this document actually refers
5 to the August, 2000, reapplication would your answer be
6 different, sir?

7 A Well, I thought that was on the second page.

8 Q Well, let's take a look at that second page.

9 A Well, the third page. The third page has got my
10 signature on it for a license. Is that the first one or the
11 second one?

12 Q Well, that's what we're going to find out, sir.
13 If you would go back to the very first page in 65? Do you
14 see at the very top hand left -- right corner? Excuse me

15 A Right here?

16 JUDGE STEINBERG: Yes, sir.

17 BY MR. ROMNEY:

18 Q Do you see that date stamp there

19 A Right.

20 Q Would you read that for the record, please?

21 A It says August 21, 2000, it looks like.

22 Q And if you'll refer back to the check that you
23 write, the fourth page of Exhibit No. 65?

24 A The fourth page?

25 Q Yes, sir. The date of that check?

1 A Is the eighth -- August 11.

2 Q Of what year, sir?

3 A 2000.

4 Q Okay. The third page? If you would go back to
5 the third page?

6 A Third page.

7 Q That is your signature on that page is it not,
8 sir?

9 A Right. Right.

10 Q And is that your handwriting on the date there?

11 A Right.

12 Q And that is August 11, 2000, as well, isn't it?

13 A Right.

14 Q Now if you would go to the second page? The very
15 top right-hand corner says that the license was issued
16 11-28-97. Is that right?

17 A Yes.

18 Q And the license expired 11-3-00? Do you see that,
19 sir?

20 A 11-3, yes.

21 Q Okay. Now, you first got a mobile phone right
22 after you or right at the same time you went to work for
23 DLB, right? You got some radios?

24 A I believe it was about six or seven months later.

25 Q Okay. That would still put it in 1994, wouldn't

1 it, sir?

2 A I believe it was 1995 is when I went to work.

3 Q It's either 1994 or 1995, isn't it?

4 A Somewhere.

5 Q Certainly not 1997, was it?

6 A No.

7 Q Okay. You understood, sir, did you not, that you
8 had to have a license to operate those mobile phones, those
9 radios in your car?

10 A No. I didn't know that.

11 Q Well, would it surprise you, sir, if you were
12 required to have an FCC license to operate mobile radios?

13 A If I owned the license, I guess so.

14 Q If you had mobile radios, you'd have to have a
15 license, wouldn't you?

16 A Yes. Yes. Yes.

17 Q And you had mobile radios back about the very
18 first time or within about six months of the time you
19 started at DLB, right?

20 A Right.

21 Q And so it would not surprise you, would it, sir,
22 if you had a license from the FCC sometime in either 1994 or
23 1995, right?

24 A Well, I've only signed for a license twice, so I
25 don't know. I don't know where this 1994 is coming up.

1 Q Okay. But it wouldn't surprise you if you had a
2 license for 1994, would it, or 1995?

3 A No, it wouldn't. It wouldn't really surprise me.

4 Q Okay. Have you seen any sort of a license?

5 JUDGE STEINBERG: Was that would or would not?

6 THE WITNESS: I said it wouldn't surprise me.

7 MR. ROMNEY: Would not surprise him.

8 JUDGE STEINBERG: That you had a license?

9 THE WITNESS: Yes.

10 BY MR. ROMNEY:

11 Q Have you seen, sir, any sort of a license from
12 1994-1995 in either your deposition or here today in Court?

13 A No, I haven't.

14 Q Have you asked the people from the FCC if there
15 was a license for you in 1994-1995?

16 A No, but I'd like to see the check on that first
17 set of licenses.

18 Q Wouldn't we all. You know what a T-band system
19 is, right?

20 A Yes.

21 Q And you know there is a difference between a
22 T-band and a 900 system?

23 A Right.

24 Q Your mobile radios are on the 900 system?

25 A Right.

1 Q And they are not on the T-band, are they?

2 A Right. No, they're not.

3 Q Do you know anything about the Sumpters' licenses,
4 the ones they got?

5 A I don't know.

6 JUDGE STEINBERG: That is also beyond the scope of
7 the direct examination, but I won't -- I mean, if the Bureau
8 doesn't object. Well, let's not get into the Sumpters.
9 I'll object.

10 MR. ROMNEY: Your Honor, am I going to be required
11 to call this witness back? I mean, I thought we were going
12 to take care of everything all at one time.

13 JUDGE STEINBERG: Okay. So this is in the nature
14 of direct examination?

15 MR. ROMNEY: Your Honor, my whole effort in all
16 this hearing --

17 JUDGE STEINBERG: Okay.

18 MR. ROMNEY: -- will be to try to do everybody at
19 one time.

20 JUDGE STEINBERG: Okay. Then when you're on
21 direct try not to lead. Do your best. I know you can do
22 it.

23 MR. ROMNEY: If I may?

24 JUDGE STEINBERG: Okay. I didn't understand.

25 MR. ROMNEY: They called him adverse to my client.

1 JUDGE STEINBERG: Okay.

2 MR. ROMNEY: No matter what you want to label
3 it --

4 JUDGE STEINBERG: You're right.

5 MR. ROMNEY: Thank you.

6 JUDGE STEINBERG: You're right. I apologize.

7 MR. KNOWLES-KELLETT: Your Honor, he's listed as
8 their witness as well. I think when he's on direct he
9 doesn't lead.

10 JUDGE STEINBERG: Ask the question.

11 MR. KNOWLES-KELLETT: If he's adverse --

12 JUDGE STEINBERG: Well, we'll ask the questions
13 and see where we're going.

14 MR. ROMNEY: Thank you.

15 JUDGE STEINBERG: I think just as an observation
16 as the presiding officer, there is a bit of hostility, and I
17 think you can treat him as a hostile witness, too.

18 MR. ROMNEY: I think clearly in light of his
19 testimony he is adverse to my --

20 JUDGE STEINBERG: Well, not --

21 MR. KNOWLES-KELLETT: Not with respect to the
22 Sumpters, Your Honor.

23 JUDGE STEINBERG: Well --

24 MR. KNOWLES-KELLETT: He hasn't testified with
25 respect to anything regarding --

1 JUDGE STEINBERG: Why don't you not comment right
2 now unless I ask you. You're stepping over my --

3 MR. KNOWLES-KELLETT: Okay.

4 JUDGE STEINBERG: You don't talk when I talk,
5 counsel, and I don't talk when you talk.

6 MR. KNOWLES-KELLETT: Okay.

7 JUDGE STEINBERG: Why don't you continue your
8 questioning?

9 MR. ROMNEY: Thank you, Your Honor.

10 BY MR. ROMNEY:

11 Q Page 3, sir, of Exhibit No. 65. There is no doubt
12 in your mind, sir, that this is a renewal of your mobile
13 license? Whether it was the first renewal or the second
14 renewal, there is still no doubt that it was a renewal,
15 correct?

16 A It was a renewal for something.

17 Q Okay. And you understood this to be a renewal for
18 the mobile phones in your car? Is that right? The phones
19 in your car?

20 A For the license itself. Not for the mobile phones
21 in my car.

22 Q You understood that you had to have a license to
23 work those mobile radios in your car, right?

24 A No.

25 MR. ROMNEY: We will ask the Court on that part.

1 BY MR. ROMNEY:

2 Q Do you cut firewood and sell it around town?

3 A Yes, sir.

4 Q Do you use the radio for that?

5 A No, sir.

6 Q You don't have your sons using the radios for
7 that?

8 A No, sir.

9 Q Your mobile radios are interconnected with
10 telephone service, is it?

11 A Right.

12 Q Is that in both cars?

13 A Right.

14 Q And your mobile?

15 A No. The mobile don't have telephone.

16 Q Okay.

17 A The mobile is actually used for the DART system
18 handi-rides.

19 Q Turn to the first page of Exhibit No. 65, sir.
20 You don't know exactly who prepared that document, do you?

21 A No, I don't.

22 Q Is it your testimony that Ron Brasher gave that to
23 you?

24 A Ron Brasher got me to sign it, yes.

25 Q Do you remember specifically this document that

1 says Remittance Advice?

2 A I didn't pay any attention to the document. I
3 just put my name on it.

4 Q How many documents --

5 A He said it was licenses. That's all I went by.

6 Q How many documents did you sign?

7 A It appears I signed two.

8 Q Well, do you recall without looking at these?

9 A Well, I think I did sign two.

10 Q Okay. Do you remember what month you signed them
11 without looking at them?

12 A Eighth. The eighth month.

13 Q April? In which year?

14 A 2000.

15 MR. KNOWLES-KELLETT: August.

16 MR. ROMNEY: I'm sorry. August.

17 BY MR. ROMNEY:

18 Q August of 2000?

19 A Yes. The eighth month.

20 Q By August of 2000, this FCC investigation had
21 already begun, had it not?

22 A Right.

23 Q And there are already some sharp feelings in the
24 families?

25 A Right.

1 Q Is that right?

2 A Right.

3 Q And when you signed the application, this renewal
4 application, there were some sharp feelings by Ms. Lutz?

5 A Yes.

6 Q She was kind of bitter about Ron and Pat?

7 A Yes.

8 Q Did she tell you that she thought that she was in
9 some sort of trouble with the FCC?

10 A That who was?

11 Q That she, Carolyn Lutz --

12 A Yes. Yes.

13 Q Did she tell you that she thought that she could
14 go to jail?

15 A No. She just said she had signed a license for
16 the T-band system, I believe.

17 Q You never signed a license for the T-band, did
18 you?

19 A No. No. Sure didn't.

20 Q Did Ms. Lutz tell you that she thought that she
21 could have some sort of big fine levied against her?

22 A No, she didn't say that.

23 Q Did she tell you what bad things could happen to
24 her?

25 A She told me she had signed a license for Ronald,